

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Pat made  
Maria's  
copy

OCT 20 2005

Clara Moraga  
Assistant Site Manager  
Pine Bluff Chemical Agent Disposal Facility  
57-210 Webster Road  
Pine Bluff, AR 71802

Dear Ms. Moraga:

The National Program Chemicals Division (NPCD) of the Environmental Protection Agency (EPA) authorizes the Pine Bluff Chemical Disposal Facility (PBCDF) to commence Interim Operations upon completion of the Deactivation Furnace System (DFS) RCRA Agent Trial Burn. Your letter dated August 30, 2005 requested approval to continue operations after completion of the DFS Agent Trial Burn and included submission of data verifying the destruction and removal efficiency of 99.9999% (six 9s DRE) during shakedown operations, as required by Condition 2.b.(3) of the National Approval dated June 6, 2003 pursuant to the Toxic Substances Control Act (TSCA). NPCD reviewed this data and found the data acceptable. This authorization becomes effective on October 24, 2005 which is the estimated date of completion of the High Temperature Test (HTT) Trial Burn for the DFS, or on the date of completion of the DFS HTT whichever occurs later.

Additionally, Condition 2(b)(3)(A)(vii) of the National Approval requires PBCDF to submit the RCRA Trial Burn Final Report to NPCD no later than 15 weeks (105 days) from the completion of the RCRA Trial Burn. Your letter dated September 14, 2005 requests that the submission date be extended to coincide with the requirement of 120 days for submission of the report to the Arkansas Department of Environmental Quality (ADEQ). NPCD hereby approves the request to extend the submission time to 120 days so that you may better manage your documentation and reporting procedures.

Please direct all technical questions pertaining to this approval to Hiroshi Dodohara at (202) 566-0507.

Sincerely,

Maria J. Doa, Ph.D.  
Director  
National Program Chemicals Division

CONCURRENCES							
SYMBOL	4404T						
SURNAME	M. Doa						
DATE	10/20/05						

cc:

Joe Stang  
Army CMA

Jim Sales  
EPA Region VI

Lou Roberts  
EPA Region VI

Mike Bates  
ADEQ

Derrick G. Warrick  
ADEQ

# ROUTING SLIP

#	NAME	ACTION	INITIAL	DATE
1	Hiroshi Dodohara	Originator	<i>HD</i>	10-19-05
2	Sara McGurk	Concur	<i>SM</i>	10-14-05
3	Dave Hannemann	Concur		
4	Maria Doa	Sign	<i>MD</i>	10/20/05
5	Pat Robinson	Administrative		
6				
7				
8				
9				

## Nature of Item Being Routed

Letter authorizing Pine Bluff to proceed with Interim Operations upon completion of the RCRA Trial Burn. In addition, this letter extends the time of submitting the final RCRA Trial Burn Report from 15 weeks (105 days) to 120 days to coincide with RCRA/State of Arkansas requirements. Target date for signature - ~~Sept 23, 2005~~ as Trial Burn begins ~~Sept 26~~ ends Nov. 4, 2005. Oct. 28

Then they will ~~be~~ be required to shutdown if not authorized by this letter.

FROM:

H. Dodohara

DATE

10/19/05  
~~9/15/05~~

TELE #

566-0507

ROOM #

EPA East 4353QQ



DEPARTMENT OF THE ARMY  
US ARMY CHEMICAL MATERIALS AGENCY  
PINE BLUFF CHEMICAL AGENT DISPOSAL FACILITY  
57-210 WEBSTER ROAD  
PINE BLUFF, ARKANSAS 71602

SF 14 2005

Maria J. Doa, Ph.D.  
Director  
National Programs Chemical Division  
United States Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Subject: Proposal to Coordinate Timeframes for Submission of the PBCDF RCRA Trial Burn Report

Reference: Email September 8, 2005 1:41 PM, W. Hollinger to H. Dodohara, et. al.

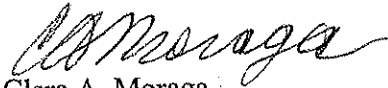
Dear Ms. Doa:

The Pine Bluff Chemical Agent Disposal Facility (PBCDF) respectfully requests an extension of the time required for submission of the Resource Conservation and Recovery Act (RCRA) Trial Burn Report pursuant to National Toxic Substances Control Act (TSCA) Approval conditions 2.b.(3).A.vii. and 2.b.(3).B. This request was discussed with Mr. Hiroshi Dodohara of your staff during a TSCA conference call on September 8, 2005 (ref).

Currently, the National TSCA Approval requires PBCDF to submit to EPA Headquarters the complete Deactivation Furnace System (DFS) GB Rockets Agent Report for the PBCDF within 15 calendar weeks (105 calendar days) following the completion of the last test run. The PBCDF requests a 15-day extension for submission of the report to coincide with the 120-calendar day requirement in the Arkansas Department of Environmental Quality (ADEQ) Hazardous Waste Permit 29-H for the PBCDF (specifically, Module VI, Condition A.5.f).

If you should require additional information on this matter, please contact Mr. Wade Hollinger at (870) 540-2031 or myself at (870) 540-2001.

Sincerely,



Clara A. Moraga  
Assistant Site Project Manager  
For Compliance

cc: EPA Headquarters - Washington, D.C. (Hiroshi Dodahara)  
EPA Region VI - Dallas, Texas (Lou Roberts, Jim Sales)  
ADEQ Hazardous Waste Division (Mike Bates, Derick G. Warrick)  
PM-CSD (Drew Lyle, Joe Stang)  
PBA (Mark Lumpkin)  
PM-CSD PBCDF Field Office (Randy Long)  
PM-CSD UMCDF Field Office (Don Barclay)  
Washington Demilitarization Company, LLC (David Reber, William G. Thomasson)



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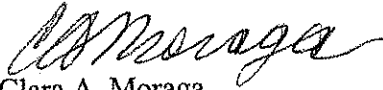
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